

**Exhibit A**

Proposed Order

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

PAUL HASTINGS LLP

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-and-

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COLE SCHOTZ P.C.

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PARKINS & RUBIO LLP

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Charles M. Rubio (admitted *pro hac vice*)  
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*Counsel to Ad Hoc Committee of Supporting  
Counsel*

In re:

LTL MANAGEMENT, LLC<sup>1</sup>,

Debtor.

Case No. 23-12825

Chapter 11

**Hearing Date and Time:  
June 1, 2023 at 10:00 AM**

Judge: Michael B. Kaplan

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Debtor: LTL MANAGEMENT LLC  
Case No.: 23-12825 (MBK)  
Caption of Order: ORDER AUTHORIZING AD HOC COMMITTEE OF SUPPORTING  
COUNSEL TO FILE UNDER SEAL AND REDACT CERTAIN  
INFORMATION IN VERIFIED STATEMENT OF PAUL HASTINGS  
LLP, COLE SCHOTZ P.C., AND PARKINS & RUBIO LLP  
PURSUANT TO BANKRUPTCY RULE 2019

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**ORDER AUTHORIZING AD HOC COMMITTEE OF SUPPORTING COUNSEL  
TO FILE UNDER SEAL AND REDACT CERTAIN INFORMATION IN VERIFIED  
STATEMENT OF PAUL HASTINGS LLP, COLE SCHOTZ P.C., AND PARKINS &  
RUBIO LLP PURSUANT TO BANKRUPTCY RULE 2019**

The relief set forth on the following pages, numbered three (3) through five (5) is hereby  
ORDERED.

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's  
address is 501 George Street, New Brunswick, New Jersey 08933.

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PURSUANT TO BANKRUPTCY RULE 2019

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Upon the motion (the “**Motion**”) of the Ad Hoc Committee of Supporting Counsel (the “**AHC of Supporting Counsel**”), by and through counsel, for an Order authorizing the AHC of Supporting Counsel to file under seal and redact its Fed. R. Bankr. P. 2019 disclosure (the “**2019 Statement**”); and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the AHC of Supporting Counsel’s notice of the Motion was appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “**Hearing**”); and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted; and the Court having further found that entry of the within Order is in the best interest of creditors and the bankruptcy estate:

Now, therefore, it is hereby **ORDERED** that:

1. The Motion is GRANTED as set forth herein.

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2. The 2019 Statement for the AHC of Supporting Counsel may be filed under seal pursuant to section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1.

3. If the 2019 Statement is filed under seal pursuant to paragraph 2 above, a redacted version of the 2019 Statement and any exhibits thereto shall also be filed on the case docket. This version shall differ from the version of the 2019 Statement filed under seal in the following respects:

- a. For individual claimants or members, the first initial of the last name may be substituted for the full last name;
- b. Any social security numbers, dates of birth, and/or dates of death, if applicable, may be redacted;
- c. For claimants or members who assert or expect to assert a claim, the disease information may be redacted; and
- d. Any confidential information related to the fee arrangements contained in any form of an engagement letter may be redacted.

4. The filing of a 2019 Statement and, if appropriate, any supplement to the 2019 Statement, that complies with this Order, as it may be amended from time to time, shall be deemed to be in complete compliance with Fed. R. Bankr. P. 2019 for all purposes.

5. The requirements of Local Rule 9018-1 are satisfied by the contents of the Motion or otherwise deemed waived.

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6. The AHC of Supporting Counsel is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

7. The requirement set forth in Local Rule 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.